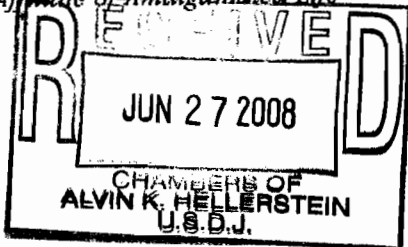


UNITE HERE Fund Administrators

UNITE HERE Fund Administrators, Inc.

An Affirmative of Amalgamated Life



June 27, 2008

VIA FACSIMILE (212) 805-7942

Honorable Alvin K. Hellerstein
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

730 Broadway
New York, NY 10003-9511
212-539-5576
fax: 212-387-0710

Re: Trustees of the Laundry, Dry Cleaning Workers and Allied Industries
Health Fund, UNITE HERE!, et al. -v.- FDR Services Corp. of New
Jersey, Inc. 07 Civ. 6972 (AKH)

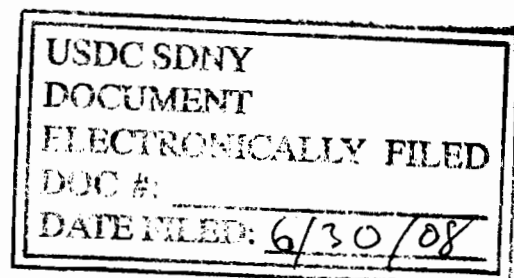
*Time to restore
is delayed to Aug 15,
2008 - 6-27-08
Alvin Hellerstein*

Dear Judge Hellerstein:

We represent the plaintiffs in the above-referenced action to collect delinquent employee benefit fund contributions owing to two Taft-Hartley employee benefit funds. Joined by Kimberly Klein, Esq., defendant's counsel, the parties are writing to request an additional adjournment of the deadline to restore the action to your Honor's calendar. Pursuant to my and Ms. Klein's discussions of the instant application with Michele of your Honor's Chambers on June 23, we make this request for the following reasons.

As we have previously advised the Court, the parties have reached a tentative settlement. The parties have concluded all outstanding issues relating to the settlement except for the specific amount of contributions at issue in the instant action. Plaintiffs have proposed, and defendant has agreed, to permit plaintiffs to audit the books and records of the employer to determine a sum certain of the outstanding contributions. The payment of such sum certain will conclude the settlement so as to permit the parties to submit a stipulation of voluntary dismissal with prejudice to conclude the action in a manner satisfactory to both parties. Plaintiffs anticipate that the audit and conclusion of the settlement will take five weeks from the date on which the Court may so order the instant application.

While the parties continue to anticipate a successful conclusion of the action without further litigation, plaintiffs wish to preserve their right to proceed with the action in the unlikely event that the parties are unable to conclude a settlement.



Honorable Alvin K. Hellerstein
June 27, 2008
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For the foregoing reasons and, in the interests of judicial economy, we respectfully request that the Court extend the deadline to restore the action to your Honor's active calendar for a period of five weeks from the date of the Court's so ordering the instant application, if such application is granted by the Court. This is the fourth request for an adjournment of the deadline to reactivate the action.

The Courts' considerations are appreciated.

~~Respectfully submitted,~~

~~David C. Sapp~~

cc(via facsimile): Kimberly Klein, Esq.